

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Mikole Rivera,

Debtor.

Case No. 19-17263

Chapter 13

Debtor's Motion to Modify Chapter 13 Plan

AND NOW, Debtor Mikole Rivera, by and through her attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor hereby requests that the Second Amended Chapter 13 Plan filed as ECF No. 58 be approved by the court and adopted as the confirmed chapter 13 plan.

2. The proposed plan: (i) adjusts the plan payment schedule to resolve the trustee's recent motion to dismiss, and (ii) provides for payment of attorney fees to the Debtor's counsel for post-confirmation services.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in her favor as may be necessary and proper under the law.

Date: April 3, 2024

CIBIK LAW, P.C.
Counsel for Debtor

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